

# EXHIBIT 1

**From:** [Roger Townsend](#)  
**To:** [Jamie Telegin](#)  
**Cc:** [Cindy Heidelberg](#)  
**Subject:** RE: Hempton v. Pond5  
**Date:** Tuesday, October 25, 2016 8:56:16 AM

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I want to make sure that we link it to the summary judgment motion.

I would like to call it, "Supplemental Submission in Support of Opposition to Motion for Summary Judgment". You could call it Notice of . . .I

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**From:** Jamie Telegin  
**Sent:** Tuesday, October 25, 2016 8:55 AM  
**To:** Roger Townsend <[rtownsend@bjtlegal.com](mailto:rtownsend@bjtlegal.com)>  
**Cc:** Cindy Heidelberg <[cheidelberg@bjtlegal.com](mailto:cheidelberg@bjtlegal.com)>  
**Subject:** RE: Hempton v. Pond5

Yes, there really isn't a category for this. What about Plaintiff's Notice of Filing Expert Report or something with Notice in it?

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**From:** Roger Townsend  
**Sent:** October 25, 2016 8:42 AM  
**To:** Jamie Telegin  
**Cc:** Cindy Heidelberg  
**Subject:** RE: Hempton v. Pond5

Can you mock up a filing for the report?

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**From:** Jamie Telegin  
**Sent:** Tuesday, October 25, 2016 8:41 AM  
**To:** Roger Townsend <[rtownsend@bjtlegal.com](mailto:rtownsend@bjtlegal.com)>

**Cc:** Cindy Heidelberg <[cheidelberg@bjtlegal.com](mailto:cheidelberg@bjtlegal.com)>

**Subject:** RE: Hempton v. Pond5

Sounds good.

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**From:** Roger Townsend  
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**To:** Jamie Telegin  
**Cc:** Cindy Heidelberg  
**Subject:** Hempton v. Pond5

Jamie:

Today, we would like to produce (but not file) two expert reports. Cindy will provide the latest and greatest.

Additionally, we are going to file the report from Expert Paul along with a cover page. It will be a little tricky to find the right category to file, but the statement will be brief in support (and Cindy/Roger will draft that part).

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